

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter Of)	
Petition of Telcordia Technologies, Inc.)	WC Docket No. 09-109
To Reform Or Strike Amendment 70,)	
To Institute Competitive Bidding for Number)	
Portability Administration and to End the)	
NAPM's LLC's Interim Role in Number)	
Portability Administration Contract)	
Telephone Number Portability)	CC Docket No. 95-116

**REPLY COMMENTS OF THE
PUBLIC UTILITY DIVISION OF THE
OKLAHOMA CORPORATION COMMISSION**

The Public Utility Division of the Oklahoma Corporation Commission ("PUD") respectfully submits the following reply comments in connection with the Public Notice released June 27, 2014¹ extending the comment filing deadlines on the North American Numbering Council ("NANC") recommendation of a vendor to serve as the next local number portability administrator ("LNPA") in the above referenced proceeding.

I. Summary

PUD recognizes that numbering issues, to include local number portability, are of critical importance to consumers and service providers, as the management of telephone numbers has significant and varied impacts on those entities. Consumers tend to attach significant value to the telephone numbers that are assigned to the telecommunications services they purchase. Service providers invest significant resources in order to be able to assign and manage telephone numbers for use in conjunction with the services they provide to their customers. Accordingly, whatever the Federal Communications Commission ("FCC") decides with regard to the NANC

¹ Public Notice DA 14-937, rel. June 27, 2014.

recommendation for the next LNPA, steps should be taken to ensure there are no disruptions to the current level of LNPA operational capabilities and accessibility. Likewise, the process should guard against the introduction of new barriers or new problems in any transition or change involving the LNPA.

By these reply comments PUD does not take any position with regard to the process undertaken by the FCC and NANC in managing this proceeding and the process of evaluating proposals nor does PUD take any position with regard to which LNPA vendor is to be selected. PUD would simply ask that the FCC give consideration and take appropriate steps to address some of the identified concerns.

II. Consumer Impact Must Be Minimized

Consumers have developed expectations around the porting of their telephone numbers when they make decisions in the market as to which provider they will utilize for telecommunications services. Any transition that negatively impacts the current porting process and associated timelines must be avoided. PUD believes that if a process change results in a longer timeline to port a number or, in the worst case, in an inability to port a number, not only will the consumer suffer, the service provider will likely take at least some of the "blame" for whatever failure might manifest.² Further, such problems could potentially lead to increased inquiries to state consumer services organizations. Negative impacts on consumers could, over time, hamper the ability of the existing competitive market to work fairly and efficiently and potentially inhibit the development of the market for new services.

² See Comments of U.S. TelePacific Corp. d/b/a TelePacific Communications ("TelePacific") and Hyper-Cube Telecom, LLC ("HyperCube") at page 4, "*Consumers demand the LNP process to go smoothly and efficiently, and hold service providers to high standards in this regard. In turn, service providers demand a high level of performance from the LNPA vendor to meet growing consumer demands.*"

PUD supports suggestions that any transition process, if ultimately undertaken, must be clearly defined and balance consumer needs and expectations with cost savings, while maintaining operational and management goals. For example, Cequel Communications, LLC d/b/a Suddenlink Communications, asks the FCC to take an active role in overseeing the transition process.

“The potential risk of errors, delays and system failures under such a transition must be mitigated through active, and early, planning and oversight. For example, the Commission should ensure that the roles and responsibilities of all industry stakeholders are clearly defined and communicated well in advance of any transition. Such a plan should include governance roles and responsibilities, dispute management and resolution processes, project timelines and key objectives, and risk assessment and contingency planning if transition timelines or events are not satisfied.”³

PUD further agrees with comments suggesting that the FCC should give consideration to extending the existing LNPA contract if the FCC believes it is necessary to develop a transition plan and allow for full and thorough testing.⁴ Such an approach would be reasonable given the complexity of this project and potential significant failures that might result without such planning and testing.

III. Any Change to LNPA Cannot Negatively Impact 911 Services

PUD supports the comments of Intrado Inc. to the extent they identify the need for continued availability of efficient data management tools for coordinating and processing the necessary changes to Automatic Location Information (“ALI”) databases resulting from LNP activities. The ability to efficiently and timely update ALI is critical in ensuring the proper routing and display of 9-1-1 calls to the Public Safety Answering Point (“PSAP”). Failure of

³ See Comments of Cequel Communications, LLC d/b/a Suddenlink Communications filed July 25, 2014 at page 4.

⁴ *Id.* Page 5

routing or display of erroneous caller location information to the PSAP could result in the loss of lives and property.⁵

Any transition to a new LNPA must have as a primary goal ensuring that existing 9-1-1 capabilities are not diminished and that future 9-1-1 capabilities are not hampered or forfeited. Ensuring the integrity of the 9-1-1 system is paramount and any transition plan must include adequate development and testing time, even if that involves an extension of time beyond the current June, 2015 contract expiration date.

IV. Conclusion

Any decision by the FCC to transition to a new LNPA vendor should be done in such a manner that the current level of operation and integrity of the LNP system is protected. This should include any required planning to identify and address, in sufficient detail, all functional, operational and management goals that are necessary to avoid any diminished LNP functionality in the system to be provided by any new LNPA vendor. The transition must also allow for robust testing by all parties that will utilize the new system as well as adequate time for such testing, even if such time requires an extension of the existing contract beyond its termination date. The stakes for consumers and network operators are simply too high to not take adequate time.⁶

Finally, particular attention should be given to those functionalities that impact the management of the 9-1-1 system and related databases such as ALI. No transition should move

⁵ See Comments of Intrado, Inc. filed July 25, 2012 at page 3.

⁶ PUD recognizes that there are costs associated with an extension of the existing contract. See CTIA / USTA Comments in WC Docket No. 09-109 & CC Docket No. 95-116 dated July 25, 2014 at page 20 ("...thus, any extension of the current contract past the June, 2015 implementation deadline will automatically trigger that clause, bringing a windfall to the incumbent administrator on the order of \$40 million *per month*. (emphasis in original)) However, while costs should be minimized, the potential additional costs do not appear to outweigh the potential negative impacts that could result from a failed transition of these critical functions.

forward until there is assurance that the new system will provide all tools necessary for the expeditious and efficient management of those databases that impact 9-1-1 calls.

Respectfully submitted,

Public Utility Division
Oklahoma Corporation Commission

A handwritten signature in dark ink, appearing to read "Maribeth Snapp", is written over a horizontal line.

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